## UNITED STATES BANKRUPTCY COURT DISTRICT OF PUERTO RICO OLD SAN JUAN DIVISION

In re:	
Luis Miguel Robles Berrios, a/k/a Luis M. Robles Berrios,	Case No.: 14-06937-BKT13 Chapter 13
Debtor. /	

## LAKEVIEW LOAN SERVICING'S MOTION TO ALLOW DEBTOR 90-DAY EXTENSION

COMES NOW, Movant, Lakeview Loan Servicing, LLC, by and through its undersigned counsel and files this Motion to Allow Debtor a Ninety (90) Day Extension to cure debt:

- 1. Movant is a Secured Creditor regarding the real property located at 67 3<sup>rd</sup> St. City Paradise, Barceloneta, Puerto Rico 00617.
- 2. Due to the property being located in a disaster area Movant would like to give the Debtor an opportunity to cure the affected months by allowing them a ninety (90) day extension. The Debtor is contractually due for the July 1, 2017 payment and post due for September 1, 2017 at this time.

WHEREFORE, Movant respectfully requests this Honorable Court to Allow Debtor a Ninety (90) Day Extension be granted and for such other and further relief as this Court deems proper.

Respectfully submitted,

Dated: December 4, 2017 /s / Ryan Meade

Ryan Meade, Esq

Puerto Rico Bar No. 231501

Quintairos, Prieto, Wood & Boyer, PA

9300 South Dadeland Blvd Miami, Florida 33156 Phone: (305) 670-1101

Fax: (305)670-1161

Email: flsdbknotices@qpwblaw.com

## **CERTIFICATE OF SERVICE**

I certify that I have caused to be served a copy of the foregoing Motion, by first class mail, postage prepaid or by CM/ECF electronic filing upon the parties listed below on this day.

Dated: December 4, 2017 /s / Ryan Meade

Ryan Meade, Esq

Puerto Rico Bar No. 231501

Copies Furnished To:

By CM/ECF Receipt:

FELIX M ZENO GLORO PO BOX 1945 ARECIBO, PR 00613 787 879-1760

Email: tribunal@zenogloro.com

Trustee

ALEJANDRO OLIVERAS RIVERA ALEJANDRO OLIVERAS CHAPTER 13 TRUS PO BOX 9024062 SAN JUAN, PR 00902-4062

U.S. Trustee MONSITA LECAROZ ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901

## By First Class Mail:

LUIS MIGUEL ROBLES BERRIOS PO BOX 1278 MANATI, PR 00674